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BOSTON MUTUAL LIFE INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

CHRISTOPHER O'KEEFE,

Plaintiff,

vs.

BOSTON MUTUAL LIFE
INSURANCE COMPANY, an
unknown business entity, and DOES 1
through 50 inclusive,

Defendants.

Case No. 07 CV 2409 L RBB

DECLARATION OF SIMON
MANOUCHERIAN IN SUPPORT OF
JOINT MOTION OF PLAINTIFF
CHRISTOPHER O'KEEFE AND
DEFENDANT BOSTON MUTUAL
LIFE INSURANCE COMPANY TO
CONTINUE EARLY NEUTRAL
EVALUATION

I, Simon Manoucherian, declare as follows:

1. I am an attorney licensed to practice law in the state of California and admitted to practice before the United States District Court, Southern District of California. I am counsel for defendant, BOSTON MUTUAL LIFE INSURANCE COMPANY ("Boston Mutual"). I have personal knowledge of the facts contained in this Declaration, and if called upon as a witness, I could and would competently testify to these facts under oath.

2. Boston Mutual, the only named defendant, has appeared in the above action and has received Magistrate Judge Ruben B. Brooks' Notice and Order for Early Neutral Evaluation Conference ("ENE") in this case, scheduled for January 23, 2008.

3. I have a conflict with this date as I will be in Kansas City, Missouri, for depositions in an unrelated matter.

4. Based on the above, the parties hereby jointly move that the ENE be continued beyond January 23, 2008 and beyond the February 11, 2008 deadline.

5. From the date that the Order setting the ENE was received on December 28, 2007, we have conferred with our client and are informed and believe that plaintiff's counsel has conferred with his client, about a possible alternative date. As of January 10, 2008, we have identified February 21, 2008, as open and available for the ENE in this case. In addition, we request that the ENE commence at 1:30 p.m., to accommodate the travel schedules for Boston Mutual's representative, traveling from the East Coast, and counsel for defendant, traveling from Los Angeles, California that the ENE commence at 1:30 p.m.

Executed this 10th day of January, 2008, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Simon Manoucherian